



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

September 22, 2020

Robert Mancini
Project Manager, Refining Business Unit
Chevron Environmental Management Company
1200 State Street
Perth Amboy, New Jersey 08861

Re: Catalyst Beads, dated March 24, 2020
Former Chevron Perth Amboy Facility
Perth Amboy, Middlesex County, New Jersey
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Catalyst Beads document, dated March 24, 2020, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The workplan was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E. We have the following comments:

1. Closing Section, Page 5, requests a NFA determination for PCBs at the former Chevron Perth Amboy Facility. We cannot evaluate PCBs with the information provided. The Catalyst Beads letter could request a "NFI Justification for Catalyst Beads", provided all the information required to make such determination is submitted.
2. Page 4, Conclusions states, "Catalyst beads used in the refining of crude oil at the Facility were initially made of naturally occurring aluminosilicate (i.e., Fuller's Earth). Later, with the advances in catalytic cracking technology, the catalyst beads consisted of synthetic aluminosilicates and zeolites coated with nickel, vanadium, platinum, palladium, rhenium, and other noble metals. PCBs were not used in the refining processes performed at the Facility and are not considered to be a potential contaminant in fill material." Please submit the information Chevron used to determine what the Catalyst Beads used at the former Chevron Perth Amboy facility consisted of or Catalyst Beads area(s) soil boring analytical data to corroborate Chevron's conclusion.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at vargas.ricardito@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Ricardo Vargas", is positioned below the word "Sincerely,".

Ricardito Vargas
Project Manager
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)

